EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re: NEURONTIN MARKETING,
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION
_____/
THIS DOCUMENT RELATES TO: MDL Docket No. 1629
Bulger v. Pfizer, et al. Master File No. 04-10981
07-11426-PBS

Smith v. Pfizer, et al.
05-CV-11515-PBS
Crone v. California State Court
_____/

The videotaped deposition of SHEILA WEISS SMITH, PH.D. was held on Monday, December 22, 2008, commencing at 9:17 A.M., at the Law Offices of Goodell, DeVries, Leech & Dann, LLP, 20th Floor Commerce Place, One South Street, Baltimore, Maryland 21202, before Ronda J. Thomas, a Notary Public.

Job No.: 183061
REPORTED BY: Ronda J. Thomas, RPR, CLR

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(APPEARANCES continued on next page.)

(APPEARANCES continued.)

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ALSO PRESENT: Robert Kowalchik, Videographer

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Deposition of SHEILA WEISS SMITH, Ph.D.
December 22, 2008

PROCEEDINGS

(Whereupon, documents were premarked as Deposition Exhibit Number 18, 19, 20 and 21.)

THE VIDEOGRAPHER: We are on the record. The time is 9:17 a.m. My name is Robert Kowalchik of Nationwide Video Production. The date today is December 22, 2008. This deposition is being held in the office of Goodell DeVries located at One South Street, Baltimore, Maryland.

The caption of the case is in Re: Neurontin Marketing Sales Practices and Products Liability Litigation in the United States District Court, District of Massachusetts. MDL Docket No. 1629 Master File No. 04-10981.

This document relates to Bulger v. Pfizer, et al. 07-11426-PBS and Smith v. Pfizer, et al. 05-CV-11515-PBS and cross noticed in the case of Crone v. Pfizer.

The name of the witness is Sheila Weiss Smith. At this time the attorneys will identify themselves and the parties they represent, after which our court reporter, Ronda Thomas of Doerner and Goldberg, will swear in the witness and we can proceed.

MR. ALTMAN: Keith Altman on behalf of Finkelstein & Partners for the Plaintiffs Products

Q Were you asked to ever review it at that time?
MR. BARNES: What time?
Q At the time it became publicly available. When we're talking about the FDA statistical review?
A Was I asked to look at it? I think I had already looked at it as soon as it became available because I wanted to put the alert in January in context. So I was very interested in what they said.
Q When was the first time you were asked to put down on a piece of paper an opinion based upon the FDA alert?
MR. BARNES: Objection. We have a stipulation in this case where drafting of expert reports is not the subject of examination. So I'll instruct her not to answer that question.
MR. ALTMAN: I'm not asking about the drafting. I'm asking when she was asked to do it. That's not the drafting.
MR. BARNES: That's a different question.
MR. ALTMAN: I asked when was the first time you were asked to opine upon the FDA alert.
MR. BARNES: That's a different question. You may answer that one.
A I believe it was in early fall.

Q Okay. When was the first time you were asked to render any opinions on the advisory committee meeting and the transcript and the discussions that took place?
A I believe it was around the same time.
Q Have you ever had any direct discussions with Dr. Robert Gibbons?
A No.
Q Do you believe that you are -- you're aware that Dr. Gibbons did a pharmacoepidemiologic study of the pharmametrics data, correct?
A Yes, I'm aware of it.
Q If you had been given that raw data as he was, do you believe you could have done a similar study?
A Yes.
Q So you pretty much see yourself as kind of colleagues, same general qualifications?
A I consider us colleagues. He's a biostatistician and I'm an epidemiologist. We typically work together on teams.
Q We talked before about the AIRS G database in this case. Have you ever received similar data from a company in the past? What I mean by that a CD, et cetera, that has their adverse event database or an

extract for a particular drug?
A Yes.
Q Did you use that, make use of that data, did you load it into a database? Did you use it in any way yourself or did you do just a quick cursory review of it and put it aside?
A That's a general question for many different situations. So I can't answer just one thing.
Q Have you ever done more with a company's internal adverse event database than you did in this particular case?
A Yes, I have.
Q Did you do that work yourself and did you have people working with you to do that?
A Depends on the situation.
Q Have you ever done it all by yourself?
A Yes.
Q What tools would you typically use to do that?
A Again, it depends on the situation.
Q What tools have you used in the past to do that?
A You mean what software?
Q What software?

A I've used D Base, starting with 2, 3, 4. Okay. I've used Excel. I've used sets, Epicure, Epi-Info. I've used SPSS. Statistical packages, database packages, access. Sometimes I've already been set up in a database. It really depends on what time, the decade, and what I'm doing and how big the database is and where it's located.
Q Is there any technical impediment that would have kept you from doing work with the AIRS G database produced in this particular litigation loaded up into one of those packages and doing computations or analysis or time trending of that data?
A No, it's just a question of time and necessity.
Q Are all reports, strike that.
Does the company have to submit every single adverse event reported received to the FDA?
A It's my understanding that they do not submit every report. There's no need.
Q So there could be and likely would be adverse event data in a company's database that wouldn't be in the FDA's database, correct?
A That is correct. They follow the federal regulations.
Q Do you know what junk science is when I use